



Environmental Committee Testimony

By Stan Sorkin, President

Connecticut Food Association

February 22, 2010

TESTIMONY IN OPPOSITION to RB 127

Good afternoon, Chairman Roy, Chairman Meyer and Members of the Environmental Committee. My name is Stan Sorkin, President of the Connecticut Food Association. Our Association provides policy advice, research, legislative and regulatory services to the grocery industry in the state. As stated in our "2009 Green Agenda for the Connecticut Food Industry", the CFA is committed to expansion of composting and elimination of food waste. However, we strongly believe that this goal can best be achieved through a well thought out voluntary means not mandated legislation. We would welcome the opportunity to work with DEP and local communities to logically define, design, and develop cost efficient composting programs while evaluating new technologies such as anaerobic digestion and organic waste elimination. As a matter of fact, some of our member companies have already implemented viable composting programs on a voluntary basis in-state and in neighboring states without the stigma of mandated legislation. We would look to expand these programs in Connecticut provided that they make economic sense.

CFA is opposed to Sec. 8's mandatory composting legislation for the following reasons:

1. "Discarded food residuals" is not defined in the language.
2. Mandating a must separate and recycle program without an economic analysis or test market approach does not make business sense. The various components and associated costs of the system must be identified and defined. Will there be additional costs that would be passed on to consumers in tough economic times?
3. By limiting language to composting, are we ruling out other methods of food residual disposal such as anaerobic digestion and organic waste elimination units which currently exist or other methods that may be under development. Organic waste elimination units turn food waste into gray water which is discharged into the sewer system, eliminates the need for transporting food waste, and thus has an excellent carbon footprint.

4. The minimum requirement of only two permitted composting facilities. Why is DEP guaranteeing a composting facility dedicated customers and revenue and granting them the luxury of duopolistic pricing?
5. At what stage do you measure tonnage of discarded food waste to see if you meet the one hundred four ton requirement and are required to compost?
6. What are the costs associated with enforcing the law?
7. Why are state institutions such as universities and prisons not subject to the law? If you are mandating private sector compliance why are you not mandating public sector compliance?

In conclusion, expanding the opportunities for the recycling of compostable waste is a viable objective which can best be achieved through a cost effective voluntary program with the input of all stakeholders and not through a poorly designed legislated mandate.